



**Re: Leominster HS - contractor work plan and qualifications list**  
Kimberly Tisa to: Bill Wessel

04/02/2012 09:06 AM

Bill-

I've reviewed this plan and provide the following comments:

1. Page 3. I'm not clear what the fiber boards are. I also noted these in the revised SIP, so the same questions applies in the SIP. If it is the backer, I think it is reasonable that it stays with the caulk. However, further clarification is requested.

2. Page 3. It is noted that all affected "CMU block" within the caulk seems will be encapsulated. However, I noted in the revised SIP that there is also reference to concrete/stone facade, not just CMU. This needs to be incorporated into the contractor work plan.

3. Page 6. Shouldn't the Notification go to the MassDEP CERO rather than NERO?

4. Page 7. Is a fence going to be installed around the work area(s) when exterior work is being conducted?

5. Page 7. It is indicated that all surfaces would be covered with plastic, including floor, ceiling, and walls. What about furniture, such as desks, tables, etc? Will these be removed during work or covered?

6. Page 7. There is mentioned about drains, grilles, and grates that will be covered with poly. What are these and where are they located?

7. Page 7. It is unclear if the decon facility will be constructed the same way for both interior and exterior abatement. Please clarify.

8. Page 9. It is indicated that caulk will be disposed of as a PCB bulk product waste per 40 CFR 761.3 at a TSCA-approved facility.

- For clarification, 761.3 is the definition section, not the disposal section which is 761.62 for PCB bulk product waste.

- Also, the landfills specified on Pages 12 and 13 are not "TSCA-approved" disposal facilities.

9. Page 9. It is indicated that decontamination fluids will be absorbed with rags. If the liquids are not flowable, this may be a reasonable approach. However, if sufficient liquid is present to capture, these liquids could not be "absorbed" with rags for purposes of disposal in a landfill.

10. Page 9. Not all debris can be disposed of as a PCB bulk product waste, only that waste which meets the definition. For example, the PPE and containment would meet the definition of a PCB remediation waste. Please note that this is also indicated in the revised SIP, so the work plan should be amended for accuracy with the PCB requirements and for consistency with the revised SIP.

11. Page 10. Just as a precautionary note, please make sure that each coat of encapsulant is "cured" sufficiently prior to next coat. Also, there should be some discussion of how (the procedure) the encapsulant will be applied to the surfaces.

12. Page 10. With respect to removal of the < 50 ppm PCB and asbestos containing window caulk, the proposed "limited" containment has been used successfully at other sites. As such, it seems reasonable to also apply it here.

13. Page 10. It is indicated that once all the caulk is removed, soil remediation will begin. This statement is made in the "Exterior Window caulk removal 1961 building". Accordingly, please clarify that the soil removal will begin once all exterior building caulk has been removed (e.g. expansion joint caulk, window caulk, etc.)

14. Page 11. It is unclear where all wastes will be disposed of. For example, used HEPA filters and pre-filters, decon water, etc.

15. Page 11. Each container should be labeled and dated as soon as the first waste is placed in the container, not at the end of the day. This also goes for the roll-offs.

16. Pages 12 and 13. The proposed disposal facilities are not TSCA-approved facilities as indicated on Page 8. Also, it is unclear if these facilities can take "manifested" wastes as indicated in Section E. Thus, as previously indicated, it should be clear how each waste stream will be managed.

Please call me should you have any questions on the above.

Also, I have reviewed the revised SIP, and have some questions. When you have an opportunity, please give me a call.

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Bill Wessel

Kim Attached is the plan prepared by the remedi...

03/27/2012 09:39:52 PM

From: Bill Wessel <bwessel@smithwessel.com>  
To: Kimberly Tisa/R1/USEPA/US@EPA  
Cc: Glenn Nelson <gnelson@smithwessel.com>  
Date: 03/27/2012 09:39 PM  
Subject: Leominster HS - contractor work plan and qualifications list

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Kim

Attached is the plan prepared by the remediation contractor, RM Technologies, as well as a listing of PCBs abatement projects they've conducted.

I wasn't sure if it is acceptable for me to pass this on to you or whether you needed this sent directly by them. If hard copies are needed or if you'd like it submitted in a different format, please let me know.

Thanks.

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**William C. Wessel**

Principal

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[attachment "RM Tech PCB Project History.pdf" deleted by Kimberly Tisa/R1/USEPA/US] [attachment "Leominster HS3-21 PCB Work Plan 3.21.12 edited version 3-24-12bw.pdf" deleted by Kimberly Tisa/R1/USEPA/US]

